## BEFORE THE POSTAL RATE COMMISSION WASHINGTON DC 20268-0001

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Complaint on First-Class Mail Service Standards Docket No. C2001-3

## MOTION TO COMPEL RESPONSE TO INTERROGATORY DBP/USPS-141 THAT HAS BEEN OBJECTED TO January 10, 2002

On January 7, 2002, the Postal Service filed an Objection to respond to my Interrogatory.

Respectfully submitted,

January 10, 2002

David B. Popkin, PO Box 528, Englewood, NJ 07631-0528

DBP/USPS-141. Since the wording of the DMCS that applies to the handling of First-Class Mail applies equally to the Letters and Sealed Parcels Subclass, the Cards Subclass, and the Priority Mail Subclass, the differences that apply between the three subclasses are relevant to this case and are necessary to fully evaluate the methods by which the service standards meet the requirements of the DMCS which are an indication of the statutory requirements.

For the reasons given, the Postal Service should be compelled to provide the answer to this interrogatory.

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with Rule 12.

January 10, 2002

David B. Popkin